

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|                                   |                                  |
|-----------------------------------|----------------------------------|
| -----X                            |                                  |
| PROJECT VERITAS and PROJECT       | :                                |
| VERITAS ACTION FUND,              | : Civil Action No. 7:23-cv-04533 |
|                                   | :                                |
| Plaintiffs,                       | :                                |
|                                   | :                                |
| -against-                         | :                                |
|                                   | :                                |
| JAMES O'KEEFE, TRANSPARENCY 1,    | :                                |
| LLC d/b/a O'KEEFE MEDIA GROUP, RC | :                                |
| MAXWELL, and ANTHONY              | :                                |
| IATROPOULOS,                      | :                                |
|                                   | :                                |
| Defendants.                       | :                                |
| -----X                            |                                  |

**STIPULATION OF DISMISSAL AS TO  
DEFENDANT ANTHONY IATROPOULOS ONLY**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiffs Project Veritas and Project Veritas Action Fund ("Plaintiffs"), and Defendant Anthony Iatropoulos ("Defendant"), (collectively, the "Parties") hereby stipulate as follows:

Plaintiffs have reached settlement with Defendant, Anthony Iatropoulos. The parties have further agreed that each party shall bear their own costs and attorneys' fees. Therefore, the Parties respectfully request that the Court enter an order dismissing the claims against Defendant Anthony Iatropoulos only, with prejudice. The claims against the remaining Defendants shall proceed.

Dated: May 13, 2024.

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)  
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Respectfully Submitted,

/s/ Sheldon J. Childers

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*Counsel for Defendant, Anthony Iatropoulos*

SO ORDERED, this 13th day of May, 2024.



Hon. Cathy Seibel

Civil Action No. 7:23-cv-04533

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 13, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully Submitted,

/s/ Jay M. Wolman  
Jay M. Wolman (JW0600)